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11 Attorneys for Plaintiff
12 United States of America

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14 IN THE UNITED STATES DISTRICT COURT
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16 EASTERN DISTRICT OF CALIFORNIA

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18 UNITED STATES OF AMERICA,
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20 Plaintiff,
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22 v.
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24 JORGE OMAR ARREDONDO-GARCIA,
25 GREGORIO ONTIVEROS VERDUGO,
26 ALBERTO NAVARRO ZAPATA, and
27 WILFREDO F. REYES,
28
Defendants.

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20 CASE NO. 2:23-CR-0162-DAD
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22 STIPULATION REGARDING EXCLUDABLE
23 TIME PERIODS UNDER SPEEDY TRIAL ACT;
24 FINDINGS AND ORDER
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26 DATE: May 5, 2025
27 TIME: 9:30 a.m.
28 COURT: Hon. Dale A. Drozd

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28 **STIPULATION**

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20 1. By previous order, this matter was set for status on May 5, 2025. ECF No. 95.
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22 2. By this stipulation, defendants now move to continue the status conference until July 28,
23 2025, and to exclude time between May 5, 2025, and July 28, 2025, under Local Code T4.
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25 3. The parties agree and stipulate, and request that the Court find the following:
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27 a) The government has represented that the discovery associated with this case
28 includes over 100 gigabytes of discovery in electronic form, including investigative reports and
related documents, surveillance video and photos, laboratory reports, wiretap intercepts from
nine separate phones, and other evidence. Much of this evidence, including most of the intercepts
and covert recordings, is in the Spanish language. All of this discovery has been either produced
directly to counsel and/or made available for inspection and copying.

b) Counsel for defendants desire additional time to review this discovery, review the current charges, to conduct investigation and research related to the charges, to discuss potential resolutions with their client, and to otherwise prepare for trial. Additionally, counsel for defendant Reyes has relayed that he recently had surgery and needs time to recover. Finally, counsel for defendant Gregorio Verdugo has relayed she needs additional time because of a recent automobile accident.

c) The government does not object to the continuance.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 5, 2025 to July 28, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 30, 2025

MICHELE BECKWITH
Acting United States Attorney

Dated: April 30, 2025

By: /s/ ADRIAN T. KINSELLA
ADRIAN T. KINSELLA
Assistant United States Attorney

/s/ J. PATRICK MCCARTHY
J. PATRICK MCCARTHY
Counsel for Defendant
JORGE OMAR ARREDONDO-GARCIA

1 Dated: April 30, 2025

/s/ DINA SANTOS
DINA SANTOS
Counsel for Defendant
GREGORIO ONTIVEROS VERDUGO

4 Dated: April 30, 2025

/s/ MARK REICHEL
MARK REICHEL
Counsel for Defendant
ALBERTO NAVARRO ZAPATA

5 Dated: April 30, 2025

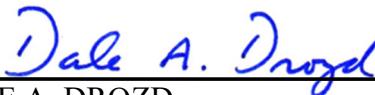
/s/ MICHAEL D. LONG
MICHAEL D. LONG
Counsel for Defendant
WILFREDO REYES

10 **ORDER**

11 Pursuant to the stipulation of the parties and good cause appearing, the status conference in this
12 case scheduled for May 5, 2025 is continued to July 28, 2025, at 9:30 a.m. and time is excluded between
13 May 5, 2025, and July 28, 2025, under Local Code T4. The court is granting the requested further
14 continuance of the status conference only because of the medical condition of two of the four defense
15 counsel as reflected in the parties' stipulation and the court's view that a compelling showing of good
16 cause has been made. **However, the court now emphasizes that no further continuances of the**
17 **status conference in this case will be granted. If for any reason counsel are rendered unavailable**
18 **on July 28, 2025, they are directed to arrange to have substitute counsel appear on their behalf at**
19 **that appearance.**

20 IT IS SO ORDERED.

21 Dated: July 14, 2025


22 DALE A. DROZD
23 UNITED STATES DISTRICT JUDGE